

May 12, 1999

Federal Communications Commission
1919- M Street, NW
Washington, DC 20554
Attn. : Low Power Radio Station Comments

MM 99-25
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My name is R. Kirk Griffin and I am the sole proprietor of K-Smoother Productions. I am responding to the notice regarding the feasibility, responsibility, diversification, and restrictions of the proposed Low Power FM Radio Concept.

Reading over the notice of proposed rule making (released Feb. 3, 1999) the first paragraph formulates the basis for creating the LPFM stations as opportunities providing low cost means of serving under served urban communities and fostering diversification in radio station ownership. These are two goals that I believe the creation of LPFM would accomplish.

However, the idea of creating these stations as non commercial stations for non profit organizations is not needed. The FCC already allocates frequencies for non commercial radio stations. The existence and need for these stations is greatly utilized, and non commercial stations represent wide range of views and offer information and entertainment in varied forms that is generally dictated and supported by local communities. Even with reduced restrictions and costs, the financial burden of owning and operating a radio station would be too much to bare for a non profit organization dependent upon financial support to sustain its own existence. The argument that LPFM stations would enable community groups and organizations to produce programs for their individual communities wears thin. Most of these organizations would operate a LPFM as a secondary means of promoting their views and or organization, and their primary intent would not be focused on owning and operating a radio station. I support people having the opportunity to voice their opinions, but I do not support a mechanism that would allow them to haphazardly proceed into a venture without full knowledge of the process and commitment that maintaining a radio station requires. The existence of non commercial radio stations already allows any group with a consistence presence to produce and distribute show(s) pertaining to their particular needs. I am aware that this does not exist in every urban or rural community, but where the opportunity already exist I believe LPFM should be commercial.



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